

REMARKS

Upon entry of this amendment, claims 45-88 will be pending in this application. In Applicant's previous reply, Applicant canceled all but claims 3, 21 and 37 on the Office's representation that these three claims would be allowable if rewritten in independent form. In its current action, however, the Office has reversed course after conducting a new search and has rejected these three claims under 35 U.S.C. §103(a) in view of Lee when combined with Nakano. Because the Office has withdrawn its indication of allowability for claims 3, 21 and 37, Applicant is now canceling these claims, as amended in Applicant's last reply, and is reinstating all 44 original claims, as amended in Applicant's reply of August 5, 2005. The claims are now numbered 45-88, but their content should be identical to that of claims 1-44 as presented by Applicant on August 5, 2005. Applicant believes that the reasons it gave for allowance in that reply still apply today, and Applicant repeats those remarks below, as they apply to the renumbered claims.

Claims 45, 63 and 87

Applicant maintains that the Lee patent does not show, nor does it even suggest, receiving "an insert request to insert data into" a database table, "where the insert request includes one or more links" that each "indicates a server connection and a storage location for data corresponding to the link," as claimed. Likewise, Lee neither shows nor suggests "opening the corresponding server connection for each link," "requesting the data" that corresponds to each link, "receiving the requested data," and then "storing the received data" in the table. Put another way, Lee says nothing about performing database inserts by providing with the insert request *not* the data that is to be inserted into the table itself, but instead a link to "a server connection" and "a storage location" at which the data is stored.

The manner in which updates are performed in Lee's "database server 16" is described in so little detail that no person of ordinary skill could possibly conclude that the insert requests received by the server include links like those claimed by Applicant. Applicant finds nothing in Lee, in fact, to suggest that the database server is anything other than a traditional database server that receives, along with each insert request, the actual data to be inserted into the "database 20." To the contrary, Lee seems to suggest that the database server is indeed of the

traditional variety, in which any update it receives from the “client system 14” includes with it the “new or revised information” that is to be loaded into the database. (Col. 11, lines 32-35.) Lee states very plainly in fact that, in dealing with the “client system 14,” “[t]he updated information 954 is received 956 by server system 12 for storing 958 in database 20.” (Col. 11, lines 38-40.) In other words, the “server system 12” (which includes the “database server 16”) receives from the client system both the insert request and the data to be inserted. In any event, Lee says nothing about receiving with each insert request “one or more links” that indicate “a server connection and a storage location for data” to be inserted into the database. Accordingly, claims 45, 63 and 87, as well as the claims that depend from them, all are patentable over Lee.

Claim 57

As with claims 45, 63 and 77 above, Lee does not show nor suggest the elements of claim 57. In particular, Lee does not show, nor does he suggest, “obtaining one or more links” that each “indicates a server connection and a storage location for” data to be stored in a “corresponding field” of a database table, nor does he show “providing” to the database system “a request . . . to load data into the table” that “includes the obtained links.” As discussed above, Lee’s “database server 16” is a traditional database server that receives with each request the data to be loaded into the table and not a “link” that “indicates a server connection and a storage location” for that data, as claimed. Accordingly, claim 57 and the claims that depend from it all are patentable over Lee.

Claim 75

Claim 75 recites “a database management component” that loads data into “data storage facilities after receiving one or more links in a request from a client system, where each link indicates a server connection and a storage location for the data to be loaded.” As discussed above, Lee does not show, nor does he even suggest, a database system that receives requests that include links like those claimed. Accordingly, claim 75 and its dependents all are patentable over Lee.

The Nakano Reference

Applicant finds nothing in the Nakano reference to overcome the deficiencies of Lee pointed out above. Accordingly, all of the claims are patentable over the combination of Lee and Nakano.

CONCLUSIONS

All of the claims in this application are allowable over the art of record. Applicant therefore asks the Office to withdraw the rejections and allow all of the claims. Please apply any charges that might be due, excepting the issue fee but including fees for extensions of time, to deposit account 14-0225.

Respectfully,

A handwritten signature in black ink, appearing to read "John D. Cowart", written over a horizontal line.

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